

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

MERLE AYERS,

Case No. 16-44736

and

Chapter 7

CHRISTINE CANTO-AYERS

AKA CHRISTINE CANTO

AKA CHRISTINE AYERS

DBA ALEXA MAR INC. 81-1023818,

HON. CARLA E. CRAIG

Debtor(s).

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NOTICE OF MOTION

PLEASE TAKE NOTICE, that upon the annexed application of attorneys for U.S. BANK NATIONAL ASSOCIATION (hereinafter “Movant”), the undersigned respectfully moves this Court for an order, pursuant to 11 U.S.C. § 362(d)(1) and terminating the automatic stay herein as to the lien interest of Movant in real property of the debtor commonly known as 14520 22Nd Avenue, Whitestone, NY 11357, together with Movant attorney’s fees and costs and such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that this motion shall be returnable on March 23, 2017 at 11:00 a.m. of that day, or as soon thereafter as counsel can be heard, before the Hon. Carla E. Craig at 271-C Cadman Plaza East, Courtroom 3529 Brooklyn, New York 11202-180.

PURSUANT TO BANKRUPTCY RULE 9014 AND LOCAL BANKRUPTCY RULE 9006-1(b), IF YOU INTEND TO OPPOSE THE MOTION, YOU MUST SERVE ON MOVANT’S COUNSEL AND FILE WITH THE CLERK OF THE BANKRUPTCY COURT, WRITTEN OPPOSITION TO THE MOTION SO AS TO ENSURE ACTUAL

RECEIPT NOT LATER THAN SEVEN (7) DAYS BEFORE THE RETURN DATE.

February 23, 2017
Westbury, NY

ROBERTSON, ANSCHUTZ & SCHNEID, P.L.
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-and-
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By: /s/ Elizabeth Doyaga
Elizabeth Doyaga, Esquire
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TO:

<i>Debtor</i> Merle Ayers 145-20 22nd Avenue Whitestone, NY 11357	<i>Joint Debtor</i> Christine Canto-Ayers 145-20 22nd Avenue Whitestone, NY 11357 <i>aka Christine Canto</i> <i>aka Christine Ayers</i> <i>dba Alexa Mar Inc. 81-1023818</i>	<i>Trustee</i> Robert J Musso 26 Court Street Suite 2211 Brooklyn, NY 11242
<i>U.S. Trustee</i> Office of the United States Trustee Eastern District of NY (Brooklyn Office) U.S. Federal Office Building 201 Varick Street, Suite 1006 New York, NY 10014	<i>Attorney for Debtor</i> Michael J Macco Macco & Stern LLP 2950 Express Drive South Suite 109 Islandia, NY 11749	<i>Chambers Copy</i> Chambers of the Hon. Carla E. Craig U.S. Bankruptcy Court, EDNY Conrad B. Duberstein Courthouse Courtroom # 3529 271-C Cadman Plaza East - Suite 1595 Brooklyn, NY 11201-1800